

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

<b>IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION</b>	<b>Master File No. 2:12-MD-02327 MDL No. 2327</b>
<b>THIS DOCUMENT RELATES TO ALL CASES</b>	<b>JOSEPH R. GOODWIN U.S. DISTRICT JUDGE</b>

**DEFENDANTS’ OBJECTIONS AND RESPONSES TO PLAINTIFFS’ “AMENDED  
NOTICE TO TAKE ORAL DEPOSITION OF DEFENDANTS THROUGH  
DESIGNATED WITNESSES” AND ACCOMPANYING  
REQUEST FOR PRODUCTION OF DOCUMENTS**

Defendants, Ethicon Inc. (“Ethicon”) and Johnson & Johnson (collectively, “Defendants”) hereby respond to Plaintiffs’ “Notice to Take Oral Deposition of Defendants through Designated Witnesses” (the “Notice”) and Exhibits “A” and “B” to the same. The Notice was filed and served on September 14, 2015 [Document 1695]. In response to the Notice, the Defendants refer to and incorporate herein the objections and responses in Defendants’ Objections and Responses to Plaintiff’s “Notice of Oral and Videotaped Deposition of Ethicon through Designated Witnesses” [Document 1627]. Further, Defendants specifically object to the deposition date identified in the Notice. In addition, Defendants state that the Notice is the subject of an ongoing meet-and-confer process with Plaintiffs’ counsel. Defendants reserve the right to supplement their response to the Notice.

Respectfully submitted,

ETHICON, INC. AND  
JOHNSON & JOHNSON

/s/ Christy D. Jones

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**CERTIFICATE OF SERVICE**

I, Christy D. Jones, certify that on September 23, 2015, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ Christy D. Jones

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